

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

ROBERT N. HARRISON,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES,  
LLC, EXPERIAN INFORMATION  
SOLUTIONS, INC, TRANS UNION, LLC,  
and DISCOVER DB, INC.,

Defendants.

Civil Action No. 3:25-cv-00374-REP

**CONSENT MOTION FOR EXTENSION OF TIME  
FOR DEFENDANT EQUIFAX INFORMATION SERVICES LLC  
TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Equifax Information Services LLC ("Equifax"), by its counsel and pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule 7, respectfully requests an extension of time, through and including September 13, 2025, to respond to Plaintiff's Complaint, and in support thereof states:

1. On May 19, 2025, Plaintiff filed a Complaint in the United States District Court for the Western District of Virginia, Charlottesville Division, styled *Robert N. Harrison., v. Equifax Information Services LLC, et al.*; Case No. 3:25-cv-000374 (ECF No. 1).

2. Equifax was served via process service on its registered agent, Corporation Service Company, on July 17, 2025.

3. Pursuant to Federal Rules of Civil Procedure 8 and 12, Equifax's response to Plaintiff's Complaint is currently due on August 7, 2025.

4. Equifax and its counsel require additional time to investigate and respond to the allegations and claims made by Plaintiff. In addition, the Parties anticipate discussing settlement

prior to Equifax filing its Answer. Accordingly, Equifax respectfully requests an initial extension of the deadline to respond to Plaintiff's Complaint, up to and including September 13, 2025.

5. This motion is made in good faith, not for purposes of delay, and granting it will not prejudice any party. This extension of time will allow Equifax sufficient time to fully investigate the allegations and claims raised by Plaintiff's Complaint, confer with counsel regarding settlement, and, if necessary, prepare a response to the Complaint. This is Equifax's first request for an extension of time.

6. On July 25, 2025, Equifax's counsel conferred with Plaintiff's counsel regarding the basis for this request and its need for an extension. Plaintiff's counsel had no objection and provided his assent to the requested extension.

WHEREFORE, Equifax respectfully requests that this Court grant its request for an extension of time to respond to Plaintiff's Complaint, up to and including September 13, 2025. A Proposed Order is attached hereto as an Exhibit to this Motion.

DATED: August 6, 2025

Respectfully submitted,

EQUIFAX INFORMATION SERVICES LLC

By: /s/ John W. Montgomery  
John W. Montgomery, Jr.  
VSB No. 37149  
Counsel for Equifax Information Services,  
LLC  
Traylor, Montgomery & Elliott, PC  
130 E. Wythe Street  
Petersburg, VA 23803  
Tel: (804) 861-1122  
Fax: (804) 733-6022  
Email: jmモンゴメリー@tmande.com

**CERTIFICATE OF SERVICE**

I hereby certify that on August 6, 2025, I filed the foregoing CONSENT MOTION FOR EXTENSION OF TIME FOR DEFENDANT EQUIFAX INFORMATION SERVICES LLC TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all participants and counsel of record.

/s/ John W. Montgomery, Jr.

John W. Montgomery, Jr.

*Counsel for Defendant*

*Equifax Information Services LLC*